

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

EARL PARRIS, JR., individually, )  
and on behalf of a class of persons )  
similarly situated, )  
Plaintiff, )  
v. )  
3M COMPANY, *et al.*, )  
Defendants. )

) Case No. 4:21-cv-00040-TWT

**DEFENDANT PULCRA CHEMICALS, LLC's**  
**MOTION TO DISMISS THE FIRST AMENDED**  
**COMPLAINT**

Defendant Pulcra Chemicals, LLC (“Pulcra”) respectfully moves the Court to dismiss Plaintiff’s First Amended Individual and Class Action Complaint (“First Amended Complaint”) [Doc 73] under Federal Rules of Civil Procedure 8(a) and 12(b)(6) for failure to state a claim. As described in its Brief in Support of its Motion to Dismiss, which is filed contemporaneously with this Motion, Plaintiff’s First Amended Complaint is deficiently pleaded, does not allege facts that would support any claim for relief against Pulcra, fails as a matter of law to state any legally actionable claims against Pulcra, and is otherwise legally meritless.

WHEREFORE, Pulcra respectfully requests that the Court grant this Motion and enter an order dismissing with prejudice Plaintiff's First Amended Complaint in its entirety as to Pulcra.

Respectfully submitted this 13th day of May 2021.

*/s/ Robert D. Mowrey*

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**CERTIFICATE OF SERVICE  
AND COMPLIANCE WITH LOCAL RULE 5.1**

I hereby certify that I have this date electronically filed the within and foregoing, which has been prepared using 14-point Times New Roman font, with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Dated: May 13, 2021.

/s/ John C. Allen  
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